

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

Civil Action No. 1:14-CV-00954-LCB-JLW

STUDENTS FOR FAIR ADMISSIONS,)
INC.,)
Plaintiff,)
vs.)
UNIVERSITY OF NORTH)
CAROLINA, et al.,)
Defendants.)

NOTICE OF RULE 30(B)(6)
DEPOSITION OF CORPORATE
OFFICER OF UNIVERSITY OF
NORTH CAROLINA

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, Plaintiff Students for Fair Admissions, Inc., will take the deposition of your designated corporate officer(s) upon oral examination on June 29, 2017, at 9:00 a.m. Eastern time, on the topics set forth in the attached schedule. The deposition will continue from day to day until completed, and will be held at the Office of University Counsel, University of North Carolina at Chapel Hill, 222 East Cameron Avenue, 110 Bynum Hall, Chapel Hill, NC 27514. The deposition may be recorded by stenograph, video tape, or other means, and will be taken before an officer authorized by law to administer oaths, or any other person before whom a deposition may be taken. The deposition will be taken for use in discovery and at trial and for any other purpose permitted by the Federal Rules of Civil Procedure or Federal Rules of Evidence.

This the 18th day of April, 2017.

/s/ Alan M. Ruley

Alan M. Ruley
N.C. State Bar No. 16407
Bell, Davis & Pitt, P.A.
Post Office Box 21029
Winston-Salem, NC 27120-1029
Telephone: 336/722-3700
Facsimile: 336/722-8153
Email: aruley@belldavisplitt.com

Thomas R. McCarthy
William S. Consovoy
J. Michael Connolly
Consovoy McCarthy Park PLLC
3033 Wilson Boulevard, Suite 700
Arlington, VA 22201
Telephone: 703/243-9423
Facsimile: 703/243-9423
tom@consovoymccarthy.com
will@consovoymccarthy.com
mike@consovoymccarthy.com

*Counsel for Plaintiff Students for
Fair Admissions, Inc.*

CERTIFICATE OF SERVICE

This is to certify that the undersigned, as counsel for Plaintiff, has this date served a copy of the foregoing document upon all parties to this action by the method(s) indicated below:

NAME	METHOD
Roy Cooper, Attorney General Stephanie Brennan, Special Deputy Attorney General Matthew Tulchin, Assistant Attorney General NC Department of Justice Post Office Box 629 Raleigh, NC 27602-0629 sbrennan@ncdoj.gov	Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/>
ATTORNEYS FOR DEFENDANTS	
Michael Y. Scudder, Jr. Skadden, Arps, Slate, Meagher & Flom, LLP 155 North Wacker Drive Chicago, IL 60606-1720 michael.scudder@skadden.com	Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/>
ATTORNEY FOR DEFENDANTS	
Lisa Gilford Skadden, Arps, Slate, Meagher & Flom, LLP 300 South Grand Avenue, Suite 3400 Los Angeles, CA 90071 lisa.gilford@skadden.com	Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/>
ATTORNEY FOR DEFENDANTS	
Jack Holtzman NORTH CAROLINA JUSTICE CENTER 224 South Dawson Street Raleigh, NC 27601 jack@ncjustice.org	Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/>
ATTORNEYS FOR DEFENDANT-INTERVENORS	
Reed Colfax Laura Gatzambide-Arandes Sasha M. Samberg-Champion Glenn Schlactus	Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/>

RELMAN, DANE & COLFAX, PLLC
1225 19th Street, NW, Ste. 600
Washington, DC 20036
rcolfax@remanlaw.com
larandes@remanlaw.com
ssamberg-champion@remanlaw.com
gschlactus@remanlaw.com
**ATTORNEYS FOR DEFENDANT-
INTERVENORS**

This the 18th day of April, 2017.

/s/ Alan M. Ruley
Alan M. Ruley
N.C. State Bar No. 16407
Attorney for Plaintiff

SCHEDULE A

The instructions, rules of construction, and definitions set forth in Rules 26, 30, and 45 of the Federal Rules of Civil Procedure are incorporated herein as if fully set forth.

DEFINITIONS

“Admissions Office” means the Admissions Office of the University of North Carolina-Chapel Hill.

“Communication” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).

“Complaint” means the Complaint SFFA filed in this action on November 17, 2014.

“Concerning” means referring to, describing, evidencing, or constituting. Requests for “documents concerning” any subject matter include documents concerning communications regarding that subject matter.

“Including” means including but not limited to.

“Plaintiff” or “SFFA” means Students for Fair Admissions, Inc. and all present and former directors, officers, employees, agents, consultants, representatives, attorneys, and any other persons acting for or on behalf of any of these entities or individuals.

The term “race” means race, ethnicity, or national origin.

“Relate” means consisting of, referring to, reflecting, evidencing, or being in any way legally, logically or factually connecting with the matter referred to or having a tendency to prove or disprove the matter referred to.

“Representative” means any and all agents, servants and employees.

“UNC-Chapel Hill” means the University of North Carolina-Chapel Hill and all present and former directors, officers, employees, agents, consultants, representatives, attorneys, and any other persons acting for or on behalf of any of these entities or individuals.

“You” and “Yours” means the University of North Carolina-Chapel Hill and all present and former directors, officers, employees, agents, consultants, representatives, attorneys, and any other persons acting for or on behalf of any of these entities or individuals.

TIME PERIOD

Unless otherwise indicated, the time period for these requests is from September 1, 2012 through the present.

RULE 30(b)(6) TOPICS OF EXAMINATION

1. The process by which applicants are considered and accepted for admission to UNC-Chapel Hill.
2. The documents used and created by the Admissions Office in the process of evaluating applicants for admission, including (but not limited to) documents that note or identify the race of the applicant.
3. UNC-Chapel-Hill’s use of electronic databases in its Admissions Office, including its tracking of students by race, ethnicity, socioeconomic status, and other factors that bear upon the admissions decision.
4. The extent to which race is used during UNC-Chapel Hill’s admissions process.

5. UNC-Chapel Hill's purpose in using race as a factor in its admissions process.
6. The history of UNC-Chapel Hill's use of a "holistic" admissions process.
7. The sharing of admissions data with third parties during UNC-Chapel Hill's admissions process.
8. Investigations by the Department of Education's Office of Civil Rights of UNC-Chapel Hill's admissions process, and UNC-Chapel Hill's response to those investigations.
9. The reports, analyses, or assessment of the Admissions Office—including, but not limited to, reports from the Office of Institutional Research & Assessment—concerning the race of those who apply, are admitted, and are enrolled at UNC-Chapel Hill.
10. All reports, analyses, or assessment so the Admissions Office of progress toward Your diversity goals by the Office of Diversity and Multi-Cultural Affairs.
11. Surveys of students or applicants regarding their experiences and views of diversity, race relations, campus climate, or the admissions process.
12. All efforts by UNC-Chapel Hill to consider and analyze alternatives to its consideration of race in the admissions process, at any time.
13. The work, analysis, and findings of the Race Neutral Alternatives Working Group, including:
 - a. The review of any literature on race-neutral admissions processes;
 - b. The review of the implementation and effects of race-neutral admissions in other jurisdictions;

- c. The review of any feasibility of implementing a race-neutral admissions process at UNC-Chapel Hill;
 - d. The costs and benefits of a race-neutral admissions process.
- 14. The work, analysis, and findings of the Committee on Race-Neutral Strategies, including:
 - a. The review of any literature on race-neutral admissions processes;
 - b. The review of the implementation and effects of race-neutral admissions in other jurisdictions;
 - c. The review of any feasibility of implementing a race-neutral admissions process at UNC-Chapel Hill;
 - d. The costs and benefits of a race-neutral admissions process.
- 15. Any analysis by UNC-Chapel Hill of disparities in the GPA, graduation rates, or chosen concentrations of matriculating students by racial categories.
- 16. The process by which applicants are evaluated along one or more factors or otherwise assigned ratings by the Admissions Office as part of the application process.
- 17. Efforts by UNC-Chapel Hill to ensure consistency or audit the reliability of the ratings assigned by admissions officers.
- 18. The extent to which UNC-Chapel Hill's Admissions Office has analyzed or otherwise discussed the "mismatch" effect in college admissions.
- 19. The extent to which relation to an alum of UNC-Chapel Hill affects the chances of admission for a particular applicant.

20. The extent to which status as a recruited athlete affects the chances of admission for a particular applicant.
21. UNC-Chapel Hill's use of reports reflecting the ethnic composition of a class during its admissions process.
22. The School Group Review process, including (but not limited to) the use or disclosure of the race of applicants during that process.
23. Efforts by UNC-Chapel Hill to measure the benefits or results of its use of race in its admissions process.
24. Efforts by UNC-Chapel Hill to measure any costs or other harms resulting from its use of race in its admissions process.
25. UNC-Chapel Hill's consideration of socioeconomic status in its admissions process.
26. Any changes to UNC-Chapel Hill's admissions process after the filing of the Complaint by SFFA.
27. UNC-Chapel Hill's certification of compliance with Title VI of the Civil Rights Act of 1964.
28. Your recruitment of high school students on the basis of their race, geographic location, socioeconomic status, or other characteristics.
29. Efforts designed to retain minority students and to address any disparity in graduation rates among ethnicities at UNC-Chapel Hill.
30. Exceptions made to your admissions standards for students reviewed by the Committee on Special Talent.